a bachelor's degree in electrical engineering from Georgia Institute of Technology and a master's degree in information networking from Carnegie-Mellon University.

2. The purpose of this declaration is to discuss the extent to which Cbeyond faces intermodal competition from cable operators and wireless carriers in the provision of DS1-based services.

3. Cbeyond is a facilities-based competitive local exchange carrier ("CLEC") serving small and medium enterprise ("SME") customers. Cbeyond's business customers range in size from six to 200 employees generally using between six and 48 phone lines. Cbeyond provides service in the following metropolitan areas: Atlanta, Chicago, Dallas, Denver, Houston, Los Angeles, San Diego and Detroit. Cbeyond's customers receive an integrated package of local and long distance voice services, broadband Internet access services and various managed services such as email, voicemail, web hosting, fax-to-email, conference calling and similar services. Cbeyond's services are delivered exclusively over DS-1 circuits; larger customers may have up to three DS-1s installed.

4. Cbeyond relies entirely upon incumbent local exchange carrier ("ILEC") DS-1 unbundled loops or enhanced extended links ("EELs") to serve its customers in a cost-effective manner. It is not economically rational for Cbeyond to self-provision DS-1 loops because the revenue opportunities associated with serving the vast majority of SME customers are insufficient to cover the cost of loop construction.

5. Cbeyond faces competition from both ILECs and other facilities-based CLECs that rely on ILECs for UNEs to provide voice and data service services for SMEs. In my experience, however, Cbeyond faces little, if any, facilities-based competition, from cable operators or wireless companies. Cable companies, for example, have not

successfully targeted the small and medium business customers that Cbeyond serves. Cbeyond offers a small-office, home-office (SOHO) product for those who subscribe to our business services, but even in this space—as illustrated by the tables below—cable competitors in Denver have managed to capture less than **[proprietary begin]** **[proprietary end]** of Cbeyond's SOHO customers in any given month. SOHO customers usually demand less sophisticated services than Small-Medium Enterprise (SME) customers. For example, SME customers often demand hunt groups, account codes, self-service capabilities, unified messaging and the ability to interface with any key system or PBX whether analog, digital or PRI. SOHO customers do not usually demand these features. Moreover, the cable companies' service offerings are better suited to the needs of SOHO customers than to the needs of SME customers The tables below reflect these differences. Cable (and wireless) competitors have captured a small number of SOHO customers from Cbeyond, but cable (and wireless) competitors have captured even fewer SME customers from Cbeyond, an astonishing **[proprietary begin]** **[proprietary end]** times fewer, in fact.

6. Cbeyond has calculated the number of customers it has lost to cable companies and wireless carriers in recent months in Denver, the only metropolitan statistical area ("MSA") of the four MSAs that are the subject of Qwest's forbearance request, in which Cbeyond offers service. From January to May 2007, Cbeyond lost a total of **[proprietary begin]** **[proprietary end]** SME customers and **[proprietary begin]** **[proprietary end]** SOHO customers in Denver to cable providers, and **[proprietary begin]** **[proprietary end]** to wireless providers. The average monthly cable churn rate for SME customers during this five-month period was

[proprietary begin] [proprietary end], for SOHO customers is was [proprietary begin] [proprietary end] and the average monthly wireless churn rate was [proprietary begin] [proprietary end]. Cbeyond's recent customer losses to intermodal competitors are summarized in the following tables:

[proprietary begin]

[proprietary end]

7. These figures confirm my experience that Cbeyond faces essentially no intermodal competition in the provision of service to small and medium businesses.

I declare under penalty of perjury that the foregoing is true and correct.

[Declarant]

Dated: August 31, 2007

ATTACHMENT D

DECLARATION OF WILLIAM D. MARKERT
ON BEHALF OF ESCHELON TELECOM, INC.

REDACTED - FOR PUBLIC INSPECTION

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
	)	
Petitions of Qwest Corporation for Forbearance	)	WC Docket No. 07-97
Pursuant to 47 U.S.C. § 160(c) in the Denver,	)	
Minneapolis-St. Paul, Phoenix, and Seattle	)	
Metropolitan Statistical Areas	)	

DECLARATION OF WILLIAM D. MARKERT
ON BEHALF OF ESCHELON TELECOM, INC.

1. I am Executive Vice President of Network Financial Management for Eschelon Telecom, Inc. ("Eschelon"). I began my employment with Eschelon in December 1999 as Director – Cost of Access. Prior to joining the company, I served in various financial, regulatory and management positions with Frontier Corporation. I have a BA degree in Business Administration from the University of Wisconsin – Whitewater and an MBA from the University of St. Thomas.

2. Eschelon is a leading facilities-based provider of integrated voice and data communications services to small and medium-sized businesses in nine states across the western United States. Eschelon operates in each of the metropolitan statistical areas ("MSAs") for which Qwest seeks forbearance—Denver, Minneapolis-St. Paul, Phoenix, and Seattle. In these MSAs, Eschelon has installed and operates six voice switches and has approximately 90 collocations. Because of the prohibitive cost of self-provisioning loop and interoffice transport facilities, the company leases DS0, DS1 and DS3 loops, DS1 enhanced extended loops ("EELs") and in many cases DS3 interoffice transport facilities from Qwest.

3. The purpose of my declaration is to demonstrate the likely financial impact of the elimination of unbundled network elements ("UNEs") on Eschelon's business in the four MSAs that are the subject of Qwest's forbearance request. For this purpose, Eschelon recently conducted separate studies of the costs it incurs to provide services via DS1 EELs, stand-alone DS1 loops and DS0 loops in the four MSAs in which Qwest seeks forbearance and the changes to its gross, EBITDA, and operating margins in the event that forbearance from unbundling requirements were granted in these MSAs.

4. The DS1 EELs study is based on the cost-based UNE price for a six-mile EEL in each density zone (which helps determine pricing based on a customer's location within an MSA) in the four relevant MSAs. Given that Eschelon would have no alterative but to purchase special access services from Qwest if DS1 loops and DS1 EEL transport UNEs were eliminated, the study assumes that the cost of a DS1 EEL (with an assumed mileage of six miles) will increase to the relevant Qwest special access price for this service, which is $283.14, plus $34.44 for the Expanded Interconnection Channel Termination ("EICT"), for a total monthly special access charge of $317.58, as established in Qwest Tariff FCC No. 1. This rate includes the 22 percent discount off of the monthly special access rate that would be available to Eschelon under Qwest's Regional Commitment Plan ("RCP") if Eschelon were to purchase the requisite volume of DS1 EELs from Qwest as special access.[1] In each of the five zones in the four MSAs, paying the special access price instead of the UNE EEL price would result in per circuit monthly recurring cost increases ranging from **[proprietary begin]** **[proprietary end]** in Zone 4

[1] *See* Qwest Corp. Tariff FCC No. 1 §§ 17.2.11.A.1 (4th revised page 17-91) (effective Aug. 19, 2006) & 17.2.11.C.1.a (1st revised page 17-98.1) (effective Aug. 31, 2004). The Qwest special access price of $317.58 is comprised of the $175.00 average tariff price of the zone 1, 2, and 3 tariff prices for a DS1 channel termination, a fixed mileage charge of $92.00, a total variable mileage charge (for six miles) of $96.00, a total EICT cost of $34.44, and a discount of 22 percent under Qwest's RCP.

in Minnesota up to **[proprietary begin]** **[proprietary end]**in Zone 1 in Denver. The DS1 EEL cost increases in each MSA are summarized in the following table:

[proprietary begin]

[proprietary end]

5. In order to calculate the effect of these price increases on Eschelon's operating margins in the provision of DS1 EEL-based retail services, we allocated to those services a proportionate share of joint and common monthly recurring expenses that Eschelon incurs such as charges associated with collocation, interconnection trunking, transit, and SS7 charges. We performed this allocation using the same methodology Eschelon uses to determine whether its retail prices cover its joint and common costs in a market. When these costs are accounted for, the total monthly special access cost of a DS1 EEL in each zone is **[proprietary begin]** **[proprietary end]**. In addition, we allocated to Eschelon's costs the Company's sales, general, and administrative ("SGA") expenses, which amount to **[proprietary begin]** **[proprietary end]** of Eschelon's revenue and its capital expenditures, which comprise **[proprietary begin]** **[proprietary end]** of Eschelon's revenue. Finally, we assumed that Eschelon would continue to charge its current price for DS1 EEL-based retail service, which is **[proprietary begin]** **[proprietary end]** throughout the Qwest region.

6. Using this analysis, Eschelon's operating cash flow margin across all zones in each MSA at issue would be **[proprietary begin]** **[proprietary end]**. The

details of this analysis are attached hereto as Exhibit 1. Specifically, if UNEs were eliminated, Eschelon's operating cash flow margin for each DS1-EEL-based circuit offered at retail would be as follows:

[proprietary begin]

[proprietary end]

If Eschelon's operating cash flow margins for DS1 EELs were approximately **[proprietary begin]** **[proprietary end]** in each zone of the four MSAs at issue, financial institutions would not extend credit to Eschelon nor would potential investors invest in the company. Consequently, Eschelon would be forced to exit the market for DS1-EEL based services in these four MSAs.

7. It is also important to point out that Qwest might try to increase its special access prices above current levels (as it has in the past). In fact, without the constraining effect of the availability of unbundled network elements, it is entirely possible that Qwest would do so. Moreover, in addition to increasing the costs of wholesale inputs, Qwest could decrease its retail prices. Indeed, Qwest has already offered a promotional retail rate of $461.00 for a DS1 EEL.[2] Qwest may also offer, on an individual case basis ("ICB"), lower retail prices for intrastate tariffed services in order to respond any competitor's price.[3] Qwest's past practices

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[2] *See* Product Notification from Qwest Corp. to CLECs, Resellers, and ISPs of "PRS and DSS Autumn's Colorful Offer" (dated June 29, 2007) (offering promotional pricing of $461 on Advanced Digital Switched Service on three-year contracts from August 13, 2007 to November 9, 2007) (attached hereto as Exhibit 2).

[3] *See* Qwest Corp., Large Business Products & Services, Data Solutions, DS-1, www.qwest.com/pcat/large_business /product/1,1016,140_4_2,00.html (last visited Aug. 29, 2007) ("Qwest DS-1 is filed and priced in both the interstate and the intrastate tariffs. . . . In competitive situations, intrastate DS-1 service may be priced on an Individual Case Basis.").

demonstrates the very real possibility that it would impose a price squeeze on Eschelon if UNEs were eliminated. A price squeeze would render Eschelon unable to make a profit, thereby forcing it to withdraw from the DS1-based services market.

8. Moreover, these concerns are not limited to DS1-EEL-based services. Eschelon conducted similar cost studies for DS0 and DS1 loops. In the DS0 loop cost study, we assumed that, post forbearance, Eschelon would be required to pay the "commercial" rate offered by Qwest for DS0 loops in the Omaha MSA after it received forbearance from unbundling obligations in certain wire centers in Omaha. That price is $15.71 per month per DS0 loop.[4] The DS0 loop cost increases in each MSA are summarized in the following table:

[proprietary begin]

[proprietary end]

We applied all of the same cost allocations and made the same assumptions as in the DS1 EEL study. As in the DS1 EELs study, the DS0 loop study revealed that operating cash flow margins for DS0 loops would be **[proprietary begin]** **[proprietary end]** if UNE DS0 loops were unavailable in the four relevant markets, indicating that Eschelon would likely be price

[4] *See* Petition for Modification of McLeodUSA Telecommunications Services, Inc., WC Dkt. No. 04-223, Declaration of Don Eben, Exhibit 3, Appendix 4 - Qwest Commercial DS0 Agreement at 69-70 (listing monthly two-wire DS0 loop rate as $15.71) (filed July 23, 2007).

squeezed out of the market for DS0-based services. These results are summarized in the following table:

[proprietary begin]

[proprietary end]

Finally, in conducting the study for stand-alone DS1-loop based services, we again used the same methodology. The stand-alone DS1 loop cost increases in each of the four relevant MSAs are summarized in the following table:

[proprietary begin]

[proprietary end]

We concluded that Eschelon's cash flow margins for DS1 loop-based services without the availability of stand-alone DS1 UNE loops are only **[proprietary begin]**

[proprietary end]. However, as demonstrated below, the margins across all zones in each MSA are **[proprietary begin]**

[proprietary end]

Only a slight increase in special access prices or reduction in Qwest retail prices would **[proprietary begin]** **[proprietary end]** for these services as well.

I declare under penalty of perjury that the foregoing is true and correct.

William D. Markert

Dated: August 31, 2007

[Proprietary Begin]

[Proprietary end]

[Proprietary begin]

[Proprietary end]

EXHIBIT 1

TO

ATTACHMENT D

DECLARATION OF WILLIAM D. MARKERT

ON BEHALF OF ESCHELON TELECOM, INC.

Qwest
Spirit of Service™

Announcement Date:	**June 29, 2007**
Effective Date:	**August 13, 2007**
Document Number:	**PROD.06.29.07.B.002829.PRS_DSS_Promo**
Notification Category:	**Product Notification**
Target Audience:	**CLECS, Reseller and ISP-GET – 14 State Region**
Subject:	**Promo - PRS And DSS Autumn's Colorful Offer**

This is to advise you of changes to a Qwest retail service offering. Please be advised that retail offers that are subject to Commission approval may change. Resellers should monitor filings since Qwest will not provide notification of changes.

Tariff/catalog/price list reference:

Malheur - Exchange and Network Services Catalog, Section 16
Minnesota – Exchange and Network Services Price List and Tariff, Section 16 (DSS only)
Nebraska – Exchange and Network Services Catalog, Section 16
Oregon – Exchange and Network Services Tariff, Section 16
Washington – Exchange and Network Services Price List and Tariff, Section 16

State(s): 14 State Region

Description: For a limited 89 day period beginning August 13, 2007 and ending on November 9, 2007, Qwest is offering a special per span promotional price of $665 on Primary Rate ISDN Service, $461 on Advanced Digital Switched Service and $671 on Basic Digital Switched Service on three (3) year contracts **or** $565 on Primary Rate ISDN Service, $431 on Advanced Digital Switched Service and $629 on Basic Digital Switched Service on five (5) year contracts for customers seeking to:

- New installation of PRS/DSS Service
- Renew expired contracts to 3 or 5 year contract terms
- Renegotiate current PRS/DSS contracts only if they are within 6 months of expiration
- Convert month-to-month pricing to 3 or 5 year contract terms
- Migrate PBX Trunks, DSS or UAS services to a PRS 3 or 5 year contract **(no Migration credits)**
- Migrate PBX Trunks or UAS services to a DSS 3 or 5 year contract **(no Migration credits)**
- Welcome customers back to Qwest PRS/DSS 3 or 5 year contracts. **Customers may receive 1 month winback credit for a 36 month contract and 2 months winback credits for a 60 month contract on their PRS or DSS service.**
- For the PRS service, this offer is only available to customers served by a host switch with PRS capabilities. Customers served by remote central offices are not eligible for this promotion.

- Service must be installed and customer must accept billing prior to February 1, 2008, unless a facility delay is caused by Qwest.
- Installation charges will be waived
- Contracts need to be signed no later than close of business November 9, 2007

- **Dates of promotion**
  08-13-07 thru 11-9-07

The same pricing, terms and conditions are available in Minnesota as a Customer Incentive.

If you have any questions or would like to discuss this notice please contact your Qwest Sales Manager. Qwest appreciates your business and we look forward to our continued relationship.

Sincerely,

Qwest Corporation

If you would like to unsubscribe to mailouts please go to the "Subscribe/Unsubscribe" web site and follow the unsubscribe instructions. The site is located at:

http://www.qwest.com/wholesale/notices/cnla/maillist.html

ATTACHMENT E

REDACTED - FOR PUBLIC INSPECTION

News Release

New Survey Shows 83 Percent of Consumers Continue to Rely on Landline Voice Service for Its Quality, Safety Features

Verizon Survey Shows Vast Majority Plan to Retain Their Home Phone Service Indefinitely

March 27, 2008

Media Contact:
Bill Kula, APR, 972-718-6924

Ellen Yu, 908-559-3496

NEW YORK - American consumers have a wide array of choices for personal communication services, but, when it comes to their home, an overwhelming majority -- including those who have a cell phone -- say they plan to keep and continue using their landline home phone indefinitely. Most often the service's proven reliability and safety were given as reasons in a new nationwide survey commissioned by Verizon.

The telephone survey, conducted by KRC Research last month, polled more than 800 consumers aged 18 and over who pay their landline phone bill. It found that:

* Eighty-three percent of the respondents intend to continue using their landline home phone indefinitely -- a strong vote of consumer confidence for landline voice service in a survey group that included a large number of participants who also have a cell phone (74 percent).

* Ninety-four percent of the respondents cited reliability and 91 percent cited safety as the key factors for retaining landline service.

* Seventy-six percent of landline phone owners use their landline phone every day.

(Note: Downloadable graphics that illustrate key points of the survey are available at http://verizon.wieck.com/.)

"These survey results underscore the reasons why we have a large and loyal base of home phone customers," said Virginia Ruesterholz, Verizon Telecom president. "Of course, Verizon offers a tremendous cell phone service too, and these consumers see their wireline phone as a critically important phone in their homes.

"For decades, the landline home phone has set the standard for unmatched performance and consistent communications quality. The day-in, day-out dependability of Verizon's landline voice service gives customers a deep sense of comfort, so they maintain a strong commitment to their landline home phone," said Ruesterholz.

Verizon's landline network processes more than 1 billion calls a day, with 99.9 percent reliability.

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Consumers Value Voice Quality, Reliability and Consistency of Service

Reflecting the significant amount of technological improvements and preventive maintenance that Verizon routinely performs on its landline network, 92 percent of respondents said they are satisfied with their landline phone service.

Ninety-eight percent of landline users consider their connection to be reliable on a typical day, and 91 percent rate their connection as reliable even on days when the weather is inclement. In 2007, Verizon invested $11 billion in its landline network, and has pumped $43.4 billion into its landline network over the past five years.

Not surprisingly, nearly 100 percent of those surveyed said voice quality - audio volume, voice clarity and tone - is important when making phone calls, and eight of 10 landline owners said voice quality is very important.

Survey respondents included users of many different cell phone services. Three-quarters (74 percent) said their landline home phone trumped their mobile phone in terms of voice quality, reliability and consistency of service.

Landline Loyalty Key to Verizon Bundling Strategy

In order to realize the most value for their spending, nearly two-thirds of consumers -- including people who live in urban areas, younger adults and those who earn more than $75,000 annually - say they would consider bundling their landline home phone with television, Internet services and wireless plans. In fact, those who have both a landline and cellular phone are more likely than those without a cellular phone to bundle their communication services, the survey found.

"Deepening further the loyalty of our existing base of landline phone customers is essential to our bundling strategy, which seeks to deliver an array of top-quality services at value-based prices," said Marilyn O'Connell, Verizon Telecom chief marketing officer. "These bundles are popular with consumers who believe that cable competitors can't offer the same level of reliability as we do with the traditional Verizon home phone service."

Verizon offers competitive pricing on bundles of broadband and entertainment services including its High Speed Internet service, FiOS Internet and FiOS TV, along with a convenient billing option for Verizon Wireless customers. By year-end 2007, bundled services continued to attract and retain Verizon customers, with more than half of all new customers choosing a bundle.

Dependability a key quality of traditional service

Nearly half of the landline phone owners surveyed said they would feel unsafe if their home did not have a landline connection, reflecting the importance of having a phone they know will be ready to dial at a moment's notice.

Typical reasons those surveyed gave for staying true to their landline home phone include: "My telephone line is my lifeline." "That's the one I use the most and it doesn't have to be recharged." "It's most ready in case of an emergency." "It gives me security that I can reach 911." "When the electricity goes out I can still use the landline phone." And, "I can depend on it 24 hours a day, 365 days a year."

The survey revealed that women, senior citizens, middle-income earners ($50,000 to $75,000 annually) and those living outside of metropolitan areas are more likely to continue using their landline phones indefinitely.

Eighty-eight percent of respondents in the survey said they owned cordless landline phones; 61 percent own a corded landline phone; and 49 percent own both types. Consumers who use only a traditional corded phone in their residence are more likely than those with only a cordless phone to want to keep their phone indefinitely, and they could not imagine living without their landline phone, according to the survey.

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Eighty-seven percent of females, versus 80 percent of males, plan to continue using their landline phone for the foreseeable future, whereas 90 percent of persons older than 65 said they will keep their landline phone forever as opposed to 82 percent of those under the age of 65.

Verizon Communications Inc. (NYSE:VZ), headquartered in New York, is a leader in delivering broadband and other wireline and wireless communication innovations to mass market, business, government and wholesale customers. Verizon Wireless operates America's most reliable wireless network, serving nearly 66 million customers nationwide. Verizon's Wireline operations include Verizon Business, which delivers innovative and seamless business solutions to customers around the world, and Verizon Telecom, which brings customers the benefits of converged communications, information and entertainment services over the nation's most advanced fiber-optic network. A Dow 30 company, Verizon employs a diverse workforce of nearly 235,000 and last year generated consolidated operating revenues of $93.5 billion. For more information, visit www.verizon.com.

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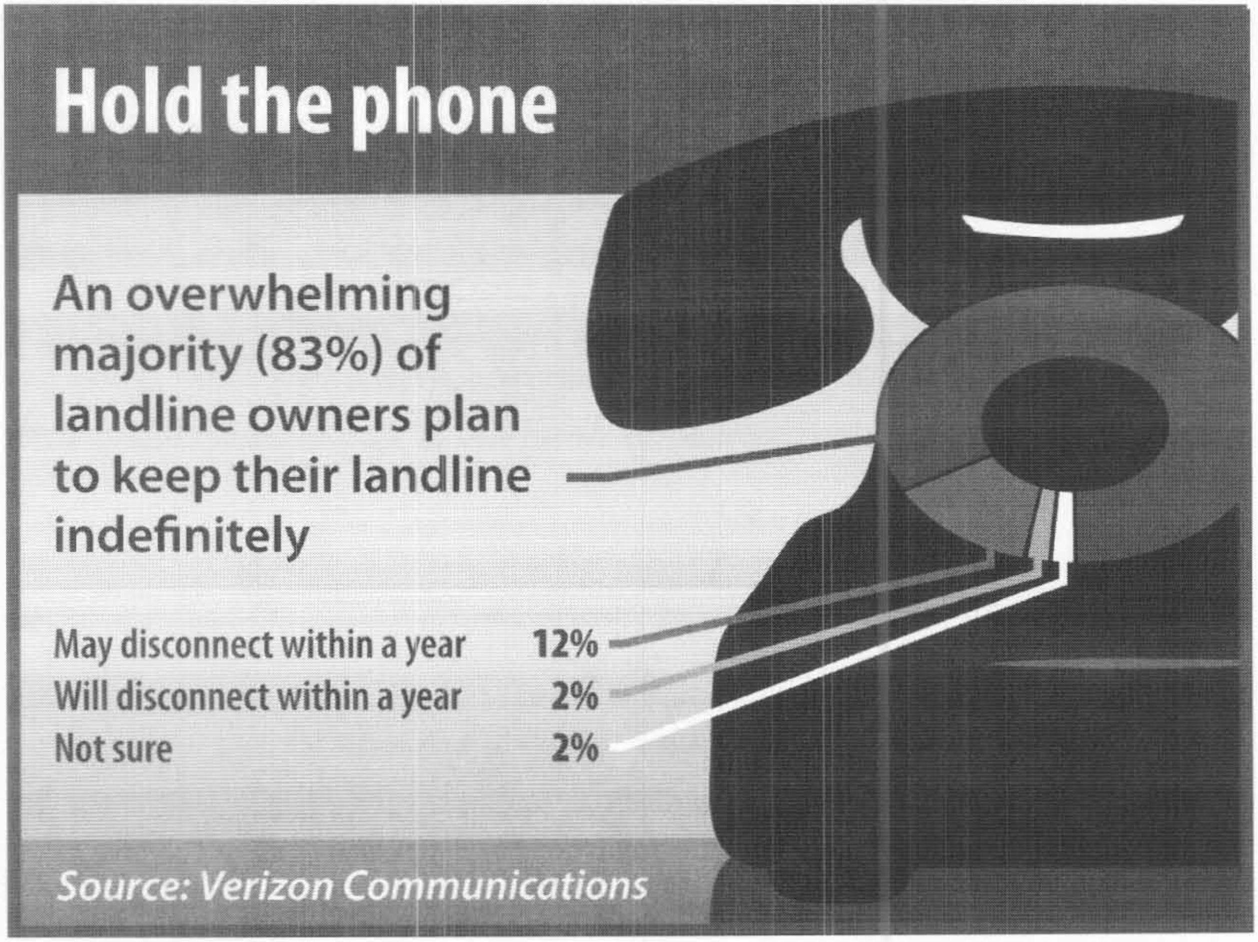
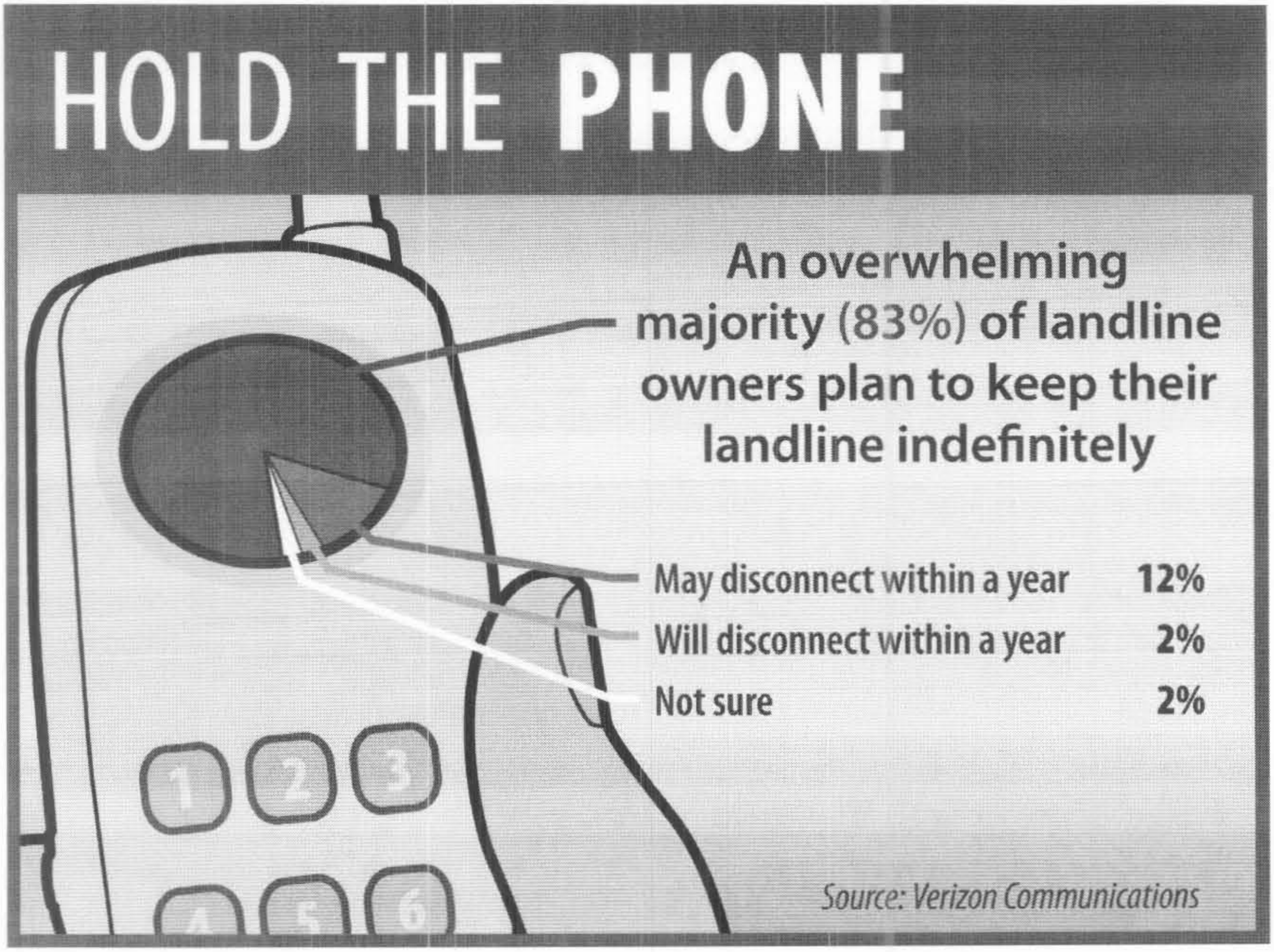
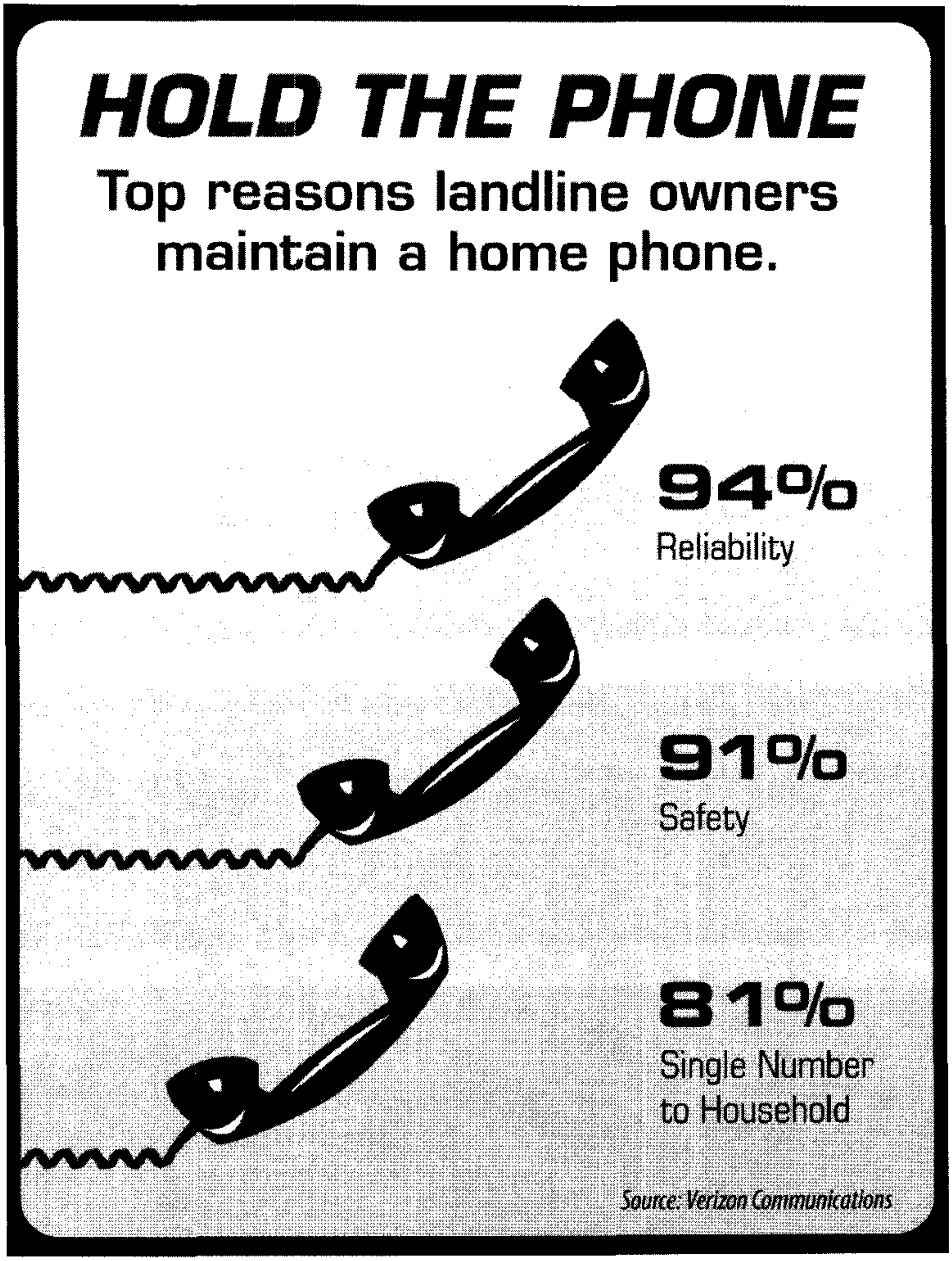

Hold the phone
An overwhelming majority (83%) of landline owners plan to keep their landline indefinitely
May disconnect within a year 12%
Will disconnect within a year 2%
Not sure 2%
Source: Verizon Communications


HOLD THE PHONE
An overwhelming majority (83%) of landline owners plan to keep their landline indefinitely
May disconnect within a year 12%
Will disconnect within a year 2%
Not sure 2%
Source: Verizon Communications


HOLD THE PHONE
Top reasons landline owners maintain a home phone.
94%
Reliability
91%
Safety
81%
Single Number to Household
Source: Verizon Communications

ATTACHMENT F

Verizon Rhode Island Business Services
Tariff Filings Since Filing of Forbearance Petition for Providence MSA (9/6/06)

Docket No.	Date	Description
3772	10/2/06	Increased prices for Frame Relay rate elements anywhere from 1 percent to 100 percent.
3787	11/1/06	Increased ATM rates by approximately 10 percent.
3811	1/29/07	Increased Business Measured Service Local Usage rates from .037 to .04 per minute; Call Waiting from $7.60 to $7.75; Call Forwarding Busy Line from $2.75 to $4.00; Call Forwarding Don't Answer from $2.75 to $4.00; Call Forward Busy Line Don't Answer from $4.00 to $6.00; Three-Way Calling from $7.40 to $7.75; Distinctive Ring Package from $6.00 to $8.00; Phone Smart Services Caller ID-Number Only from $4.95 to $7.00; Caller ID from $8.75 to $10.00; and Call Waiting ID with Name from $8.75 to $11.00.
3812	1/29/07	Increased rates for certain business services, including Restoral of Service from $30.01 to $32.95; Installation of Network Service from $44.61 to $49.95; Change of Grade of Service from $23.88 to $25.95; Change of Telephone Number from $30.01 to $32.95; Rearrange Combined Billing from $7.32 to $8.00; and Transfer Service from $7.67 to $8.50.
3813	1/29/07	Increased rates for Private Line services by approximately 10 to 15 percent.
3823	3/2/07	Increased non-published service from $4.00 to $4.95; non-directory listed services from $2.53 to $3.00; and N-411 service from $1.25 to $1.50.
3825	3/2/07	Included DSL, FiOS, and Verizon Long Distance revenues in Business Link reward plan.
3852	6/22/07	Introduced Unlimited Dial Tone for Business and Unlimited CustoPak for Business.
3875	9/7/07	Introduced ISDN PRI Plus bundle.
3895	11/1/07	Increased rates for certain ATM and Frame Relay rate elements by approximately 10 percent.

Docket No.	Date	Description
3909	1/2/2008	Increased rates for unlimited local usage for business exchange access lines and Centrex Plus access lines from \$20.50 to \$22.50 per month and unlimited local and toll for business exchange access lines and Centrex Plus lines from \$27.00 to \$29.00 per month.
3910	1/11/08	Increased rate for Business Measured 1-Party Service from \$20.95 to \$21.95.
3929	2/29/08	Increased rates for certain Private Line and Data services (many of which were increased on 1/29/07) by 10 to 15 percent.
3930	2/29/08	Increased rate for Enhanced Flexgrow Service Option, Analogue Line/PBX Trunk/Centrex Plus – Monthly from \$3.75 to \$6.75.
3938	3/20/08	Proposed increase in rates for unlimited local usage for business exchange access lines and Centrex Plus access lines -1 year term from \$16.50 to \$18.50 per month, and unlimited local and toll usage for business exchange access lines and Centrex Plus access lines -1 year term from \$23.00 to \$25.00 per month.

Source: Rhode Island Public Utilities Commission Docket Menu, http://www.ripuc.ri.gov/eventsactions/docket.html (last visited Mar. 28, 2008).